Mid-November	1,458
Early December	2,963
Mid-December	4,243
Early January	4,408
Mid-January	4,831
Early February	16,394
February 11	16,599

9. The final category reflects orders from August until the present that MCI WorldCom sent to BA-NY, were confirmed by BA-NY (accompanied by a planned due date), for which BA-NY failed to send a Notice of Completion ("NOC"). Without the NOCs, indicating the provisioning status of the respective orders and the update to BA-NY's billing systems to final bill, MCI WorldCom cannot initiate billing without a likelihood that a customers will be double billed. MCI WorldCom relies on these notifications to ensure appropriate bill cut off at BA-NY and bill initiation at MCI WorldCom. When these transactions are not sent by BA-NY to MCI WorldCom, customers may receive no MCI WorldCom local billing for some period. To further aggravate the situation, the customer may then experience back billing covering that period, so that their first bill from the new local provider is much larger than it should be. Again, customers naturally blame MCI WorldCom for these billing issues caused by BA-NY.

10. The numbers below represent the thousands of customers that have been impacted as a result of BA-NY's delays and failure to provide NOCs. MCI WorldCom has been unable to bill thousands of customers for usage as a result of this issue. Since August, lost or delayed orders in this category have risen steadily with little relief and no root cause identified by BA. In addition, BA-NY's poor implementation of the second, new transport method, SSL3, aggravated a more serious problem. MCI WorldCom has been given no indication that BA-NY is adequately addressing lost orders in this category, despite all detail order data having been provided to BA-NY.

PENDING NOTICES OF COMPLETION

Mid-July	1,091	
Early August	356	
Mid-August	297	
Early September	400	(Estimated)
Mid-September	4,090	
Early October	7,013	
Mid-October	8,160	
Early November	9,488	
Mid-November	11,837	
Early December	15,577	
Mid-December	11,856	

Early January	14,377
Mid-January	18,195
Early February	21,293
February 11	20,424

11. While all of the causes for the backlog have not been identified, part of the problem likely lies in the fact that many CLEC orders are dropping to manual processing after service has been provisioned but before they have cleared BA-NY's billing systems. MCI WorldCom has learned from BA-NY, for example, that BA-NY drops local service orders to manual processing if there is a pending change order for that customer's long distance service (a "PIC/LPIC" change). Manual processing in these circumstances is completely unnecessary because there should be no conflict between the local service order and the PIC/LPIC change order. Unnecessary manual processes like these inevitably lead to errors and delays.

12. Finally, BA-NY has implemented no end-to-end audits or controls. MCI WorldCom repeatedly has asked BA-NY to implement self-measurement and self auditing. BA-NY has failed to do so. MCI WorldCom contends that these procedures are not only necessary, but economically sensible.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Mindy J. Chapman

February [illegible], 2000

Subscribed + sworn to before me by Mindy J. Chapman on February 1st, 2000.

Notary for State of Colorado

My Commission Expires 9/29/2003

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held in the City of Albany on February 11, 2000

COMMISSIONER PRESENT:

Maureen O. Helmer, Chairman

CASE 00-C-0008 - Complaint of MCI Worldcom, Inc. against Bell Atlantic-New York concerning Billing Completion Notices, Firm Order Commitments, Acknowledegments and Tracking Numbers, filed in 99-C-1529.

CASE 00-C-0009 - Complaint of AT&T Communications of New York, Inc. against Bell Atlantic-New York concerning Acknowledgements, Completion Notices and Pre-Order Outages, filed in 99-C-1529.

ORDER DIRECTING IMPROVEMENTS TO WHOLESALE SERVICE PERFORMANCE

(Issued and Effective February 11, 2000)

In late December 1999, MCI Worldcom, Inc. and AT&T Communications of New York, Inc. filed with the Department requests for expedited dispute resolution. The complainants alleged that deficiencies in Bell Atlantic-New York's (Bell Atlantic) operation support systems (OSS) were, among other things, causing wholesale orders to drop out of the normal OSS systems and substantially delaying the ability of consumers to move their service to competitive local exchange companies.

Over the past several weeks, the Department has confirmed the allegations and worked with the competitive carriers and Bell Atlantic to identify and resolve the problems. By letter dated February 4, 2000, Bell Atlantic acknowledged the system problems and committed to resolve them. It indicated that, in the short term, it would develop temporary solutions to ensure that wholesale customers would receive adequate service and thereby be able to continue mass market efforts. The problems, nonetheless, remain substantially unresolved.

Because adequate wholesale service is critical to the vitality of the newly developing competitive markets, the Performance Assurance Plan requires Bell Atlantic to serve wholesale customers in accordance with performance levels set forth in a variety of monthly metrics. Bell Atlantic's current performance problems, however, if unabated for another month, could undermine the ability of competitors to provide local service in New York State. The Commission, therefore, is invoking its authority under the Public Service Law to require Bell Atlantic to comply with particular performance levels, described herein, on a daily basis.

First, Bell Atlantic will be directed to process and provision orders each day in accordance with the standards set forth below. Further, inasmuch as system problems have generated a substantial backlog of orders that directly affect wholesale users and their customers, Bell Atlantic will be directed to respond to all outstanding trouble tickets by dates certain, with appropriate notifications and order status information.

Until the system problems are resolved to the Commission's satisfaction, Bell Atlantic must report daily to the Director of the Office of Communications the number of wholesale orders that it has requested its wholesale customers to resubmit. This information will enable the Department to monitor the progress of Bell Atlantic's interim, work-around solution.

Authority is reserved to the Commission in the Amended Performance Assurance Plan to reallocate available bill credits. By letter dated February 7, 2000, parties were invited to submit comments concerning reallocation. Comments were received from the Office of Attorney General, AT&T Communications of New York, Inc., MCI Worldcom, Inc. and Nextlink New York, Inc. The commentors agreed that the seriousness of the situation required a response.

Given the importance of the timely provisioning of notification to competitive carriers, it is appropriate to reassign weights within the UNE and Resale Mode of Entry ordering

domains. The weights of OR metrics 1-02-%On Time LSRC - Flow Through - POTS; 1-04-%On Time LSRC <10 lines (No Flow Through) - POTS; 1-06-%On Time LSRC>=10 Lines - Flow Through - POTS; 2-02-%On Time LSR Reject - Flow Through - POTS; 2-04-%On Time Reject <10 Lines (No Flow Through) - POTS; 2-06-%On Time LSR Reject>=10 Lines (No Flow Through) - POTS; and 4-02-Completion Notice - %On Time - POTS & Specials are doubled. Further, in the UNE Mode of Entry ordering domain, the weights of Complex metrics 1-04, 1-06, 2-04, and 2-06 are changed to 0 and the weight of 6-03-%On Time Accuracy LSRC is reduced to 10.

In the Critical Measure allocation, metric #3 (6-03-%On Time Accuracy LSRC) will be replaced with the metrics that are doubled in the Mode of Entry noted above. The dollars allocated to metric #3 will be allocated to the various metrics that are added according to each metric's relative weight. The reallocations in the Amended Performance Assurance Plan, together with the directives in this order, will maximize the company's incentive to resolve the problems described above in an expeditious manner.

This action is taken on an emergency basis under the State Administrative Procedure Act Section 202(6). The immediate adoption of this rule is necessary for preservation of the general welfare of New York customers. The resolution of Bell Atlantic's OSS problems is essential to enable competitive telephone companies to offer local access service to customers. Delayed implementation of corrective measures will delay competitive service offerings to customers to the detriment of the general welfare.

This order will remain in effect until the Commission is advised by Department Staff that Bell Atlantic's systems and processes are performing at satisfactory levels.

It is Ordered:

1. Bell Atlantic shall respond to and clear all trouble tickets filed from January 1, 2000 to February 11, 2000

regarding missing orders, acknowledgements, firm order confirmations, and notices of provisioning and/or billing completion, by no later than 5:00 p.m. on February 18, 2000. Trouble tickets filed prior to January 1, 2000 shall be cleared by February 15, 2000. Bell Atlantic's response should either provide the notice(s) that were the subject of the trouble ticket or, in the case of orders that Bell Atlantic has been unable to retrieve or recover, request the wholesale customer to re-send the order. If a wholesale customer is requested to re-send orders, Bell Atlantic must ensure that no more than 5%, on a daily basis, of the orders are rejected as a duplicate order.

2. For orders submitted by wholesale customers via EDI beginning February 18, 2000, Bell Atlantic shall process and provision the orders according to the intervals set forth in the carrier-to-carrier guidelines, including related notices according to the intervals set forth in the carrier-to-carrier guidelines. Firm Order Commitments and Billing Completion Notices must be timely provided at a minimum 90% performance level measured on a daily basis. Bell Atlantic shall submit by 3:00 p.m. each day, until further notice, a report to the Director of the Office of Communications showing Bell Atlantic's on-time performance for the previous day.

3. Bell Atlantic's Amended Performance Assurance Plan shall be modified as set forth in the body of this order effective March 1.

4. This order is adopted on an emergency basis pursuant to Section 202(6) of the State Administrative Procedure Act.

5. This proceeding is continued.

(SIGNED)

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Commissioner

B

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Texas	)	CC Docket No. 00-4

REPLY DECLARATION OF DONALD G. PRICE
ON BEHALF OF MCI WORLDCOM, INC.

Based on my personal knowledge and on information learned in the course of my business duties, I, Donald G. Price, declare as follows:

1. My name is Donald G. Price. I am Senior Manager for State Regulatory Policy in the regulatory organization of MCI WORLDCOM ("MCI WorldCom"). I was closely involved with the Texas MCI WorldCom/Southwestern Bell Interconnection Agreement from the time of the initial arbitration proceeding in 1996 through the subsequent arbitrations before the Texas Public Utility Commission ("PUC") in 1997. Additional biographical details appear in my January 26, 2000 Declaration in this proceeding.

2. The purpose of this Reply Declaration is to respond to the Evaluation of the PUC, specifically as it relates to the three non-recurring charges that MCI WorldCom and others contend are "glue charges," imposed – inappropriately – when CLECs order a combination of unbundled network elements ("UNEs") that are already combined in the

Southwestern Bell ("SWBT") network. These charges are the two-wire analog loop charge, the analog line port charge, and the analog loop to switch port cross-connect charge.

3. The PUC claims in its Evaluation that SWBT's non-recurring cost studies reflect the costs involved in providing both UNEs that are ordered separately and used in new combinations *and* UNEs that are ordered as part of a pre-existing combination, which require no combining work, and therefore provide a weighted average cost for *all* combinations, new and pre-existing. *See* PUC Evaluation, CC Docket No. 00-4 (Jan. 31, 2000), at 26.

4. However, I have reviewed SWBT's cost studies and find that they do not reflect any probability that UNEs will be ordered as part of pre-existing combinations, which require no combination work by SWBT, and therefore do not factor those instances into their average weighted costs. Instead, the cost studies reflect only those instances in which actual combining work may be required, and therefore provide only the average weighted cost of combining UNEs into new combinations.

5. If SWBT's cost studies had reflected those instances in which UNEs are ordered as part of pre-existing combinations, the studies would include a calculation or estimate as to the percentage of orders anticipated to be for UNEs in pre-existing combinations. Such a calculation is required in order to develop a weighted average that weighs *both* the costs of providing UNEs in new combinations, and the absence of such costs when providing UNEs in pre-existing combinations. SWBT's cost studies do not include any such calculation or estimate.

6. Instead, SWBT's cost studies assume that the work for which the non-recurring charge is imposed will be performed on *every* order. For example, SWBT's cost study to support its loop non-recurring charge assumes a 100% probability, meaning that it assumes the work will be required for every loop ordered. *See* Texas Unbundled Loop Cost Study, November 1997 (SWBT Proprietary Materials, Volume 1, Tab 2) (pages not numbered).

7. Similarly, SWBT's cost study to support its cross-connect non-recurring charge also estimates the probability of the work being required as 100%, *i.e.*, it assumes these costs will be incurred *every* time. *See* Texas Crossconnect Study to DCS and Switch Ports, 1997-1999, September 1997, at SWBT0104478 (SWBT Proprietary Materials, Volume 6, Tab 42).

8. The one relevant cost study that does not use a 100% probability factor is SWBT's port study, which uses a probability factor of "20% *manual.*" See Brief of Appellant AT&T Communications of the Southwest, Inc., *SWBT v. AT&T*, No. 98-51005 et al. (filed April 15, 1999), at pp. 38, 39 n.27 (Exh. 1 hereto) (citing Arb. II, Oct. Hrg. SWBT Ex. 19A "Analog Line Side Port Study (Jan. 15, 1997) at SWBT 0034001) (emphasis added); Texas Unbundled Analog Line-Side Port Cost Study, November 1997, SWBT108088 (SWBT Proprietary Materials, Volume 5, Tab 29). The wording makes clear that the study assumed that the data entry would be performed the remaining 80% of the time, but that it would be performed *electronically*. Therefore, the assumption that 20% of the ports ordered will need manual data input is based on experience solely with ports that need data input. In other words, the average

weighted cost is based solely on SWBT's experience that 20% of *unbundled* ports require manual data input.[1/] The study does not take into account the many ports that will be ordered as part of pre-existing combinations. A study that did take these instances into account would reach a probability percentage (the percentage of ports ordered that require manual data input) far lower than SWBT's study reached.[2/] Thus, SWBT's 20% probability factor results in a very different, and far higher, average weighted cost than would a study that reflected orders for UNEs provided as part of existing combinations.

9. Significantly, SWBT does not agree with the PUC's current characterization of SWBT's cost studies as determining an average cost for combining work that averages in the majority of instances when CLECs order pre-existing combinations and no combining work will need to be done. SWBT, in contrast, characterized these studies in its Application as determining the cost of work that has nothing to do with combining UNEs. *See* Smith Aff. ¶ 42.

1/ *See* Affidavit of Barbara A. Smith ("Smith Aff.") ¶ 42 (SWBT App. A, Part A-3 Tab 4).

2/ *E.g.*, Compare a study that assumes all UNEs will require combination work, and a study that reflects a percentage of UNEs that will be ordered as part of pre-existing combinations. SWBT's cost study assumes that 20% of *uncombined* ports are likely to require manual data input, but because it also assumes that *all* ports provided are uncombined, it therefore concludes that 20% of *all* ports require manual data input. In contrast, a study that reflects – for illustrative purposes – an estimate that 90% of port orders will be for pre-existing loop-port combinations, would conclude, based on the same field experience, that only 2% of all port orders would require manual data input (20% of the 10% of orders that require any combination work).

10. SWBT's current characterization of the cost studies, however, is also inaccurate, which is made clear by the descriptions of the work provided by SWBT itself. *See id.*

11. For example, SWBT claims that the loop non-recurring charge reflects the costs of tracking and managing SWBT's network inventory of loops, the cross-connect non-recurring charge reflects the costs of end-to-end testing of cross-connects, and the port non-recurring charge reflects the manual data entry sometimes required for unbundled ports. *See id.*

12. These are all work activities, however, that are not needed when UNEs are ordered as part of a pre-existing combination. When a CLEC orders a loop that continues to serve the same customer at the same telephone number, SWBT does not need to search in its existing loop inventory tracking system, test or activate a new loop, or develop a new loop inventory tracking system. When a CLEC orders a cross-connect that is already installed and functional in SWBT's network, SWBT does not need to perform new end-to-end testing. Finally, when a CLEC orders a port that is already serving the same customer, the port is not an unbundled UNE that may require manual data entry to be activated.

13. Since none of the tasks described in the Smith Affidavit as the work underlying the non-recurring charges is a task required when CLECs order UNEs as part of pre-existing combinations, the cost studies do not justify imposing these charges for such orders.

14. This concludes my Reply Declaration on behalf of MCI WorldCom.

I declare under penalty of perjury under that the foregoing is true and correct.

Donald G. Price

Dated: February 19, 2000.

DECLARATION OF DONALD G. PRICE

ATTACHMENT 1

No. 98-51005

IN THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

SOUTHWESTERN BELL TELEPHONE COMPANY

Plaintiff - Appellant - Appellee

vs.

AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.; ET AL

Defendants - Appellees - Appellants*

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

BRIEF OF APPELLANT AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.

Mark Witcher
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ATTORNEYS FOR AT&T
COMMUNICATIONS OF THE
SOUTHWEST, INC.

Date: April 15, 1999

*Full style set forth within.

misconception that the three studies relevant here reflect the fact that in the vast majority of situations *no* work will be performed because the requested elements are already combined.

From the cost studies themselves it is clear that to the extent any probabilities were ever considered, those probabilities were how actual installations that *did* need to be done would be accomplished, and not how often no installation at all would be required. Thus, for example, the Unbundled Network Component Cross Connect Study (Arb. II, Oct. Hrg. SWBT Ex. 19A) states that the nonrecurring costs it examined were those "to provide service to a customer." Thus, if any such "probabilities" are considered in the study, they are clearly the probabilities of SWBT having to actually connect the loop to the switch when a new customer calls SWBT and makes an order to start service. And the only cost study that might support the largest charge – the $15.03 Two-Wire Analog Loop charge – contains the figure 100% for every item in the "probability" column, meaning that SWBT assumed the work would be done on *every* order, which is entirely inconsistent with SWBT's claim that the studies accounted for the ocassions on which no work would be done. Arb. II, Oct. Hrg. SWBT Ex. 19A "Texas Unbundled Loop Study" (Jan. 15, 1997) at SWBT

0369.[27] In sum, the evidence in the cost studies does not support SWBT's racterization of them as probabilistic in any sense that can support the district court's decision. This, of course, is not surprising, given that, by definition, when SWBT is providing service to its own customer, the NID is connected to the loop, the loop is connected to the switch, and the switch port it activated.

To be sure, SWBT's cost studies are hardly notable for their clarity. But, under the controlling FCC rules, any ambiguity in this respect must be construed against SWBT, which bore the burden of justifying its proposed charges. *See* 47 C.F.R. § 51.505(e) ("An incumbent LEC must prove to the state commission that the rates for each element it offers do not exceed the forward-looking economic cost per unit of providing the element, using a cost study that complies with the methodology set forth in this section and § 51.511."); Local Competition Order ¶ 691 ("Any function necessary to produce a network element must have an associated cost. The study must explain with specificity why and how specific

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[27]Further, the only relevant cost study that used a figure less than 100% for the probability factor was the Analog Line-Side Port Study, which used a "20% *manual*" factor. Arb. II, Oct. Hrg. SWBT Ex. 19A "Analog Line Side Port Study (Jan, 15, 1997) at SWBT 0034001 (emphasis added). The reference in this study to "manual" makes it clear that the factor was intended to consider the amount of time that the covered work had to be done manually, as opposed to electronically, not the percentage of time that the work was to be done *at all*.

C

SWBT Missed Performance Standards for October, November, and December 1999

Includes Trend Analysis - August through December

Source: SWBT Performance Data as Reported at SWBT's Website: CLEC.SBC.COM.

Legend:

No = Missed or failed measure

No* = SWBT claims to satisfy standard but only because z-allowance improperly applied to benchmark

No** = Z-score is marginal (.8225 < z < 1.645) with a marginal score or a failure in one of the two preceding months

PM	Description	Region	Month	CLEC	SWBT	Benchmark	Z-Value	Result
PM 1	Average Response Time for OSS Pre-Order Interfaces - VERIGATE - Address Verification (Seconds)	CO	Aug	5.0		4.7	0.32	No*
			Sep	6.4		Seconds	1.73	No
			Oct	5.7			0.98	No*
			Nov	5.5			0.79	No*
			Dec	4.9			0.23	No*
PM 1	Average Response Time for OSS Pre-Order Interfaces - VERIGATE - Service Availability (Seconds)	CO	Aug	14.2		6.6	7.62	No
			Sep	4.6		Seconds	(2.00)	
			Oct	5.8			(0.84)	
			Nov	3.1			(3.46)	
			Dec	7.9			1.32	No*
PM 1	Average Response Time for OSS Pre-Order Interfaces - VERIGATE - Service Appointment Scheduling (Seconds)	CO	Aug	0.7		1.0	(0.34)	
			Sep	0.6		Seconds	(0.44)	
			Oct	0.7			(0.33)	
			Nov	0.5			(0.46)	
			Dec	1.2			0.18	No*
PM 2	% Responses Received within 5 Seconds - VERIGATE - Address Verification	CO	Aug	82.0%		80%	(1.96)	
			Sep	79.0%			0.71	No*
			Oct	79.0%			1.27	No*
			Nov	81.0%			(1.42)	
			Dec	83.0%			(2.66)	

PM	Description	Region	Month	CLEC	SWBT	Benchmark	Z-Value	Result
PM 2	% Responses Received within 7 Seconds. - VERIGATE - Address Verification	CO	Aug	86.0%		90%	3.97	No
			Sep	83.0%			7.09	No
			Oct	83.0%			7.04	No
			Nov	86.0%			4.25	No
			Dec	87.0%			3.38	No
PM 2	% Responses Received within 4 Seconds - VERIGATE - Request for Telephone Number	CO	Aug	85.0%		80%	(4.67)	
			Sep	78.0%			2.20	No
			Oct	79.0%			0.87	No*
			Nov	80.0%			0.02	
			Dec	81.0%			(1.17)	
PM 5	% FOCs Returned within 5 Hours - Mechanized - LEX - Res. and Simple Bus.	CO	Aug	99.0%		95%	(4.03)	
			Sep	95.4%			(0.36)	
			Oct	93.9%			1.13	No*
			Nov	95.8%			(0.84)	
			Dec	98.3%			(3.26)	
PM 5	% FOCs Returned within 24 Hours - Mechanized - LEX - Complex Bus. (1-200)	CO	Aug	96.2%		94%	(2.15)	
			Sep	96.5%			(2.54)	
			Oct	88.8%			5.21	No
			Nov	93.4%			0.59	No*
			Dec	98.2%			(4.20)	
PM 5	% FOCs Returned within 5 Hours - Mechanized - LEX - UNE Loop (1-50)	CO	Aug	90.2%		95%	4.83	No
			Sep	94.1%			0.95	No*
			Oct	90.1%			4.87	No
			Nov	94.2%			0.82	No*
			Dec	97.5%			(2.53)	
PM 5	% FOCs Returned within 5 Hours - Mechanized - EDI - UNE Loop (1-50)	CO	Aug	99.4%		95%	(4.41)	
			Sep	96.3%			(1.30)	
			Oct	88.1%			6.86	No
			Nov	92.7%			2.26	No
			Dec	85.8%			9.17	No

PM	Description	Region	Month	CLEC	SWBT	Benchmark	Z-Value	Result
PM 5	% FOCs Returned within 24 Hours - Manual - Complex Bus. (1-200)	CO	Aug	n/a		95%	< 10 obs	
			Sep	n/a			< 10 obs	
			Oct	83.9%			10.11	No
			Nov	87.9%			6.13	No
			Dec	96.2%			(2.19)	
PM 5	% FOCs Returned within 24 Hours - Manual - UNE Loop (1-50)	CO	Aug	91.9%		95%	3.56	No
			Sep	94.7%			3.13	No
			Oct	88.7%			6.28	No
			Nov	80.7%			14.26	No
			Dec	94.9%			0.15	No*
PM 5	% FOCs Returned within 24 Hours - Manual - Switch Ports	CO	Aug	92.3%		95%	1.67	No
			Sep	89.0%			5.01	No
			Oct	87.0%			7.03	No
			Nov	74.2%			19.81	No
			Dec	36.4%			57.64	No
PM 10.1	% Manual Rejects Received Electronically and Returned in 5 Hours	CO	Aug	76.1%		97%	20.92	No
			Sep	69.6%			27.35	No
			Oct	59.5%			37.48	No
			Nov	65.1%			31.93	No
			Dec	69.5%			27.55	No
PM 11.1	Mean Time to Return Manual Rejects Received Electronically via LEX or EDI	CO	Aug	6.17		5 Hours	1.17	No*
			Sep	8.13			3.13	No
			Oct	10.10			5.10	No
			Nov	14.94			9.94	No
			Dec	35.65			30.65	No
PM 13	Order Process % Flow Through - LEX	CO	Aug	82.7%	91.3%		36.83	No
			Sep	87.6%	91.3%		16.40	No
			Oct	87.5%	91.0%		18.35	No
			Nov	88.0%	91.3%		18.56	No
			Dec	88.3%	92.0%		21.84	No